

CUOMO LLC

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October 20, 2014

VIA ECF

Hon. Jesse M. Furman
U.S. District Court Judge
Southern District of New York
500 Pearl Street
NY NY

Re: USA v. Michael Lucarelli
Case No. 14 MJ 1878 (JMF)

Dear Judge Furman:

I write in response to the court's memorandum endorsement, dated October 20, 2014, attached to the letter from AUSA Brian Blais, dated October 17, 2014. I, along with my co-counsel Patrick McGinley, had reviewed the transcript and the issue of "duty to LHA" with our client Michael Lucarelli.

The defendant agrees with our position (and that of the government) that his plea allocution sufficiently establishes his guilt to the charge of insider trading. He also specifically agrees that it sufficiently acknowledges that he had an obligation not to act on the non-public information to which he had access through his affiliation with LHA.

Thank you for your attention in this matter.

Very truly yours,



OSCAR MICHELEN (OM5199)

The Court agrees.

SO ORDERED.



October 20, 2014

